

No. 15-1074

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In the United States Court of Appeals  
for the District of Columbia Circuit

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AMPERSAND PUBLISHING, LLC, D/B/A SANTA BARBARA NEWS-PRESS,

*Petitioner,*

v.

NATIONAL LABOR RELATIONS BOARD,

*Respondent,*

GRAPHICS COMMUNICATIONS CONFERENCE INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS,

*Intervenor for Respondent.*

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On Petition for Review of an Order of the National Labor Relations Board

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**STATEMENT OF INTENT REGARDING DEFERRED APPENDIX**

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Pursuant to Federal Rule of Appellate Procedure 30(c), Petitioner Ampersand Publishing, LLC, d/b/a Santa Barbara News-Press (“News-Press”) hereby notifies the Court that it has agreed with Respondent National Labor Relations Board (“NLRB”) to utilize a deferred appendix.

On April 30, 2015, the News-Press filed a statement that such deferred appendix would not be necessary. That statement, however, was made when the News-Press was represented by former counsel, the Zinser Law Firm, P.C., which withdrew as counsel of record on July 15, 2015. Attorney C. D. Michel subsequently took over representation of the News-Press on appeal, filing an Entry of Appearance on September 18, 2015. After conducting an independent review of the record on appeal and discussing the matter with counsel for the NLRB, counsel for the News-Press has determined that, due to the size and complexity of the record, it is necessary to defer the appendix until after briefing.

Date: October 30, 2015

**MICHEL & ASSOCIATES, P.C.**

/s/ C. D. Michel

C. D. Michel

*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2015, an electronic PDF of  
STATEMENT OF INTENT TO UTILIZE DEFERRED APPENDIX was uploaded  
to the Court's CM/ECF system and served upon the parties at the electronic mail  
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Graphics Communications  
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Brotherhood of Teamsters*

Date: October 30, 2015

**MICHEL & ASSOCIATES, P.C.**

s/ C. D. Michel

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C. D. Michel

*Counsel for Petitioner*